

FEB 06 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE MANNING

MAGISTRATE JUDGE DENLOW

UNITED STATES OF AMERICA

V.

JOSE DOMINGO-CASTRO and
BORIS CHINCHILLA-LINARES

No. 08 CR 63

Violations: Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i) and Title 18, United States Code, Section 2

The SPECIAL MARCH 2007 GRAND JURY charges:

On or about January 28, 2008, at Peru, in the Northern District of Illinois, Eastern Division,
and elsewhere,

BORIS CHINCHILLA-LINARES and

JOSE DOMINGO-CASTRO,

defendants herein, for the purpose of private financial gain, knowing and in reckless disregard of the fact that certain aliens had come to, entered, and remained in the United States in violation of law, did transport and move such aliens, namely 10 nationals from Mexico, Guatemala and El Salvador, within the United States by means of transportation and otherwise, in furtherance of such violation of law;

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i),
and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The SPECIAL MARCH 2007 GRAND JURY further alleges:

1. The allegations of Count One of this indictment are realleged and incorporated here by reference as if fully restated herein for the purpose of alleging forfeiture pursuant to Title 8, United States Code, Section 1324(b) and Title 18, United States Code, Section 982(a)(6)(A).

2. As a result of their violations of Title 8, United States Code, Section 1324, as alleged in the foregoing indictment,

BORIS CHINCHILLA-LINARES and
JOSE DOMINGO-CASTRO,

defendants herein, shall forfeit to the United States, pursuant to Title 8, United States Code, Section 1324(b) and Title 18, United States Code, Section 982(a)(6)(A), any and all right, title, and interest they may have in any property, real and personal:

a. that constitutes, and is derived from, and is traceable to, proceeds obtained, directly or indirectly, from the commission of the offense; and

b. that is used to facilitate, and is intended to be used to facilitate the commission of the offense, which property is subject to forfeiture pursuant to Title 18, United States Code, Section 982.

3. The interests of the defendants subject to forfeiture pursuant to Title 8, United States Code, Section 1324(b)(1) and Title 18, United States Code, Section 982(a)(6)(A), include, but are not limited to, approximately \$1,200 in United States currency.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY